



CITY OF DALLAS

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M St., N.W. Room 222
Washington, DC 20554

Enclosed please find eleven (11) copies of comments In
the Matter of General Docket No. 92-235. prepared by the
City of Dallas. Please distribute our comments for
record, appropriate FCC staff, and to the FCC
Commissioners.

Sincerely,

Judith A. Shaw, Assistant Director
Communication Services Division
Department of Information Services

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Replacement of Part 90 by)
Part 88 to Revise the Private)
Land Mobile Radio Services and)
Modify the Policies Governing Them)

PR Docket 92-235

To: The Commission

COMMENTS
of
THE CITY OF DALLAS

The City of Dallas ("Dallas") hereby submits these comments to the above captioned docket.

Dallas is a city with a population of 1,006,877 and encompasses 333 square miles with its jurisdictional boundaries. The public safety communication system of Dallas is the eighth largest in the nation and remains at the forefront of technological innovation.

Dallas commends the Commission for its foresight in realizing the need for additional spectrum that addresses not only current demand but also allows for development of innovative technology.

As they are stated in the docket, the requirements of channel splitting, height and power reduction, and the transition time frame would have severe negative financial consequences for the City of Dallas.

The initial "two-for-one" channel splitting in VHF and UHF would necessitate the replacement of all Dallas radios operating in those bands. Existing radio equipment cannot be modified to operate safely and reliably, if at all, on narrower bandwidths.

The height and power limitations would force Dallas to develop new transmitter sites to cover areas of Dallas jurisdiction.

The additional transmitter sites will require more communications infrastructure, such as microwave paths or dedicated telephone lines, for the purpose of transmitter control. Further expense will be incurred to develop the new sites with equipment shelters and antenna support structures.

The timetable imposed for the initial transition, January 1, 1996, will not allow Dallas adequate amortization of existing equipment.

A cursory examination of the costs for equipment and infrastructure just to comply with requirements of the January 1, 1996 transition indicates a project that will rival the cost of any public works project Dallas has ever undertaken. Particularly bothersome is the fact that Dallas will have no more in terms of communications ability than it has today.

A project of this financial magnitude would be difficult to ~~implement in such economic conditions given the current~~

Dallas believes that significant changes to this proposed rule making are necessary to alleviate the concerns expressed above and are imperative.

1. The initial transition period should be done away with since it serves no real purpose.
2. For Public Safety/Local Government eligibles, coverage should coincide with jurisdictional or operational boundaries. Arbitrary height and power limitations should not be imposed.
3. The minimum channel bandwidth for any band should be no less than 6.25 KHz until it can be demonstrated that a radio can be produced with satisfactory audio quality at less bandwidth.
4. Radio manufacturers and licensees should not be restricted to only reduced frequency deviation to meet the narrower bandwidth limitations. They should be given the latitude to modify both modulation and deviation, i.e., a tradeoff between the two.
5. The timetable for transitioning to narrower channels should be, at a minimum, ten years from the date the new rules become effective. Licensees must be able to purchase equipment that is capable of operating in both the existing and future modes during this time, so that a gradual exchange of hardware is made during normal and realistic equipment replacement time schedules. This would result in licensees having replaced the majority of their hardware with equipment capable of operating on the narrower bandwidths by the time the transition is mandated.
6. Licensees should be given the latitude to choose differing modulation schemes e.g. CDMA, TDMA, etc., for the purpose of operating on existing frequencies at present bandwidth as long as they can demonstrate increased efficiencies that meet the intent of this proceeding.

Absent these fundamental changes, this proceeding could have the result of forcing the citizens of Dallas to choose between emergency services with unreliable or non-existent public safety communications or severely diminished City services. Abandoning a provincial view, Dallas sees this

proceeding having far reaching effect on most, if not all, cities since they are facing the same or worse financial outlook as Dallas.

For the above reasons, Dallas requests that the Commission reconsider and make substantial changes to the rewrite of